I.	SUMMARY OF REPLY COMMENTS	Page 1
II.	THE PRIMARY LINE PROPOSALS ARE CONTRARY TO LAW,	Page 2
	UNWORKABLE AND UNNECESSARY	
	A. The Primary Line And Capping Proposals Provide Insufficient Support	Page 2
	To Maintain And Construct Rural Telecommunications Networks.	
	B. The Primary Line And Capping Proposals Violate The Provisions Of	Page 3
	The Act And Are Unlawful.	
	1. The Proposals Violate Section 254(b) (1) Of The Act	Page 3
	2. The Proposals Violate Section 254(b) (2) Of The Act.	Page 4
	3. The Proposals Violate Section 254(b) (3) Of The Act.	Page 5
	4. The Proposals Violate Section 254(b) (5) Of The Act.	Page 5
	5. The Proposals Violate The Acts Public Interest Requirement For Rural LECs.	Page 5
	6. The Primary Line And Capping Proposals Must Be Rejected By The Commission.	Page 6
	C. The Primary Line Proposals Are Administratively Unworkable.	Page 6
III.	THE PRIMARY LINE AND CAPPING PROPOSALS ARE	Page 8
	UNNECESSARY IF APPROPRIATE ETC DESIGNATION	
	REQUIREMENTS ARE ADOPTED	
	A. Standardized Minimum ETC Criteria That Are Evaluated In Fact	Page 8
	Intensive And Rigorous ETC Designation Process Must Be Adopted.	
	1. That it has adequate financial resources in order to provide quality	Page 8
	services throughout the designated service area.	
	2. Its commitment and ability to provide services throughout the	Page 9
	designated service area to all customers who make a reasonable	
	request for service; Its commitment to use the funding it receives only	
	to support infrastructure within the designated service area; and That	
	its designation will not result in cream-skimming by allowing the	
	applicant to serve only the low-cost, high revenue customers in the	
	designated service area.	
	3. Its ability to remain functional in emergency situations.	Page 10

	4. The Impact of its designation on the USF. The State Commission or FCC must consider the impact on the growth of the fund.	Page 10
	5. That it will abide by consumer protection requirements imposed by	Do ao 11
	State Commissions or the Commission.	Page 11
	B. Additional Minimum ETC Criteria Are Required In Order To Insure A	Page 11
	Rigorous and Fact Intensive ETC Designation Analysis And To Insure	1 age 11
	That The ETC Designation Is In The Public Interest.	
	1. Applicant claims that there will be increased competition and that the	Page 12
	advantages of the ETC designation outweigh the disadvantages must	
	be verified.	
	2. The Applicant Must Be Required To Provide Equal Access.	Page 13
	3. A Specified Amount Of Local Usage Must Be Provided.	Page 13
	4. The Commission(s) Should Evaluate Whether Additional ETCs	Page 16
	(primarily wireless carriers) Have A Cost-Based Need For Support.	rage 10
	5. Minute Of Use Blocking Is Necessary For All Per-Minute Charges,	Page 17
	Not Just For Toll Charges.	I ugo I /
	6. Customer Service Agreements Requiring Payment of Termination	Page 18
	Penalties Should Not Be Allowed For Universal Service Offerings.	i uge 10
	C. Summary of Proposed Minimum ETC Criteria.	Page 18
IV.	ASSERTIONS MADE BY A NUMBER OF COMMENTERS ARE	Page 20
	INCORRECT	
	1. Universal Service Support Is Not Intended By The Act To Be Used To	Page 21
	Artificially Insert Competition Into Rural Areas.	
	2. ETC Designation Requirements Are Not A Barrier To Entry And Do	Page 22
	Not Restrict Competitive Entry.	
	3. The Commissions Have The Authority Under The Act To Impose	Page 23
	Additional ETC Designation Requirements In Rural LEC Service	
	Areas.	
	4. Multiple ETC Designations In Rural LEC Areas Are Unsustainable	Page 23
	And Must Be Limited	